

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Janisha P. Price,

Plaintiff,

v.

Waste Management, Inc.,

Defendant.

Case No. 1:13-cv-02535-ELH

DEFENDANT’S MOTION TO DISMISS

Defendant Waste Management, Inc. (“WMI”), by and through its undersigned counsel, and pursuant to Rules 12(b)(1) and 12(b)(2) of the Federal Rules of Civil Procedure, hereby moves for dismissal of the Complaint.¹ As explained more fully in the accompanying memorandum of law, plaintiff Janisha Price’s (“Plaintiff”) Complaint should be dismissed because (1) this Court lacks personal jurisdiction over WMI; and (2) this Court lacks subject matter jurisdiction over Plaintiff’s Title VII claims.

¹ Plaintiff, who is proceeding *pro se*, is advised that the failure to respond to a dispositive motion may result in the district court granting the motion and dismissing the case. *Roseboro v. Garrison*, 528 F.2d 309 (4th Cir. 1975).

Respectfully submitted,

/s/ Alison N. Davis

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November 26, 2013